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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

LYRICFIND, INC.,

Plaintiff,

v.

MUSIXMATCH S.P.A. and
TPG Global, LLC,

Defendants.

Case No. 25-cv-02265

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING MOTION TO
DISMISS BRIEFING SCHEDULE**

Hon. Jacqueline Scott Corley

Pursuant to Civil Local Rules 6-1(a), 6-2(a), and 7-4(b), plaintiff LyricFind, Inc. (“Plaintiff” or “LyricFind”) and defendants Musixmatch S.p.A. (“Musixmatch”) and TPG Global, LLC (“TPG”) (collectively, “Defendants”) stipulate as follows:

WHEREAS, Defendants waived service under Federal Rule of Civil Procedure 4(d), with Defendants reserving all objections and arguments for dismissal, and received the complaint in the above-captioned matter on March 7, 2025, pursuant to which TPG’s deadline to answer or otherwise respond to the complaint would be May 6, 2025, and Musixmatch’s deadline to answer or otherwise respond to the complaint would be June 5, 2025;

WHEREAS, Musixmatch anticipates filing a motion to dismiss pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), and TPG anticipates filing a motion to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6);

WHEREAS, Plaintiff agrees that Musixmatch does not waive or forfeit its challenge to personal jurisdiction by filing a combined motion to dismiss under Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6);

WHEREAS, TPG has requested, and Plaintiff has agreed, to a 30-day extension of time for TPG to respond to the complaint, and accordingly, the parties have further agreed to the stipulated briefing schedule and page limits set forth herein;

WHEREAS, this is the parties’ first request for any time modifications in this case;

WHEREAS, the parties’ stipulated briefing schedule will not alter the date of any event or deadline already fixed by Court order;

NOW, THEREFORE, pursuant to Local Rules 6-1(a), 6-2(a), and 7-4(b), by and through their respective counsel of record and subject to the Court’s approval, the parties hereby stipulate and agree as follows:

1. Each Defendant shall answer, move to dismiss, or otherwise respond to the complaint on or before June 5, 2025.
2. Plaintiff shall file its opposition(s) to any motion(s) to dismiss filed by TPG and/or Musixmatch no later than 35 days after TPG and/or Musixmatch files any motion(s) to dismiss.

3. Each Defendant shall file any reply in support of its respective motion to dismiss no later than twenty days after Plaintiff files its opposition thereto.

4. Musixmatch's anticipated combined Rule 12(b)(2) and Rule 12(b)(6) motion to dismiss, and LyricFind's opposition thereto, are each limited to 40 pages, with any reply by Musixmatch limited to 20 pages. Page limits for briefing any Rule 12(b) motion by TPG remain in accordance with the Federal and Local Rules.

IT IS SO STIPULATED.

Dated: April 21, 2025

Respectfully submitted,

/s/ Kellie Lerner

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~~PROPOSED~~ ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: April 22, 2025


HON. JACQUELINE SCOTT CORLEY
UNITED STATES DISTRICT JUDGE